## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SHANIECE MATHEWS, as guardian <i>ad</i> , <i>litem</i> and on behalf of her son D.W.,	)	
Plaintiff,	)	
r iaintiii,	)	No. 18-cv-6675
v.	)	Judge Joan B. Gottschall
The State of Illinois et al.,	)	
Defendants.	)	

## PLAINTIFF'S MOTION FOR ORAL ARGUMENT

Plaintiff Shaniece Mathews by her undersigned counsel respectfully moves that this Court set down a date for oral argument on the Defendant's Renewed Motion to Dismiss, which was filed on December 17, 2021. In support of this motion Plaintiff states:

- 1. Plaintiff believes oral argument on Defendants' Renewed Motion to Dismiss may be useful but defers to this Court's determination. Plaintiff's opposition to Defendants' Renewed Motion to Dismiss was filed on January 7, 2022, and the Defendant's reply was filed on February 18, 2022.
- 2. This Court previously denied Defendants' first Motion to Dismiss by order and opinion of September 30, 2019.
- 3. Defendants believe that the issues are fully addressed in the brief and that oral argument is unnecessary but would defer to the Court.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this court set down a date for oral argument on the Defendant's Renewed Motion to Dismiss.

Respectfully submitted,

Dated: February 1, 2023

By: /s/ *Thomas H. Geoghegan*One of Plaintiff's Attorneys

Thomas H. Geoghegan
Michael P. Persoon
Willem Bloom
Despres, Schwartz & Geoghegan, Ltd.
77 West Washington Street, Suite 711
Chicago, Illinois 60602
(312) 372-2511
admin@dsgchicago.com

Kelly Nicole Sampson (*pro hac vice* forthcoming) Shira Lauren Feldman **Brady Center to Prevent Gun Violence** 840 First Street NE, Suite 400 Washington, DC 20002 (202) 370-8100 ksampson@bradyunited.org sfeldman@bradyunited.org

Attorneys for the Plaintiff